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*Attorney for Defendant
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DENISE FAIVRE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

PERRY JOHNSON & ASSOCIATES, INC.,
NORTHWELL HEALTH, INC., and COOK
COUNTY HEALTH

Defendants.

CASE NO.: 2:23-cv-01926

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF DENISE FAIVRE'S
COMPLAINT**

(SECOND REQUEST)

Plaintiff Denise Faivre, individually and on behalf of all others similarly situated, ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A"), and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiff filed the Complaint on November 20, 2023 and served PJ&A on November 28, 2023. Northwell executed a waiver of service that was entered on November 29, 2023.

On December 8, 2023, a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C.

1 § 1407 (the “Motion”) was filed in the Judicial Panel on Multidistrict Litigation (“JPML”). *See In*
2 *re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, Case MDL
3 No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the potential consolidation
4 and transfer of at least forty-five related putative class action complaints. The JPML heard oral
5 arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party has agreed that centralization is proper, the primary
10 question for the JPML is *where* to centralize the cases, not *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline for Northwell and PJ&A. The parties respectfully submit that there is good
13 cause for this extension and the requested extension is not for the purpose of delay.

14 ///

15 ///

16 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

3 By: /s/ Alex L. Fugazzi

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*Counsel for Defendant Northwell
Health, Inc.*
**pro hac vice forthcoming*

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: January 29, 2024

Dated: January 26, 2024.

STRANCH, JENNINGS & GARVEY,
PLLC

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Dated: January 26, 2024.

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